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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY;)	
WISHTOYO FOUNDATION,)	
)	
<i>Plaintiffs,</i>)	Case No. 2:24-cv-05459-MWC-MAA
)	
v.)	FEDERAL DEFENDANTS'
)	CERTIFICATION OF THE
DOUG BURGUM, et al.,)	SUPPLEMENTAL
)	ADMINISTRATIVE RECORD
<i>Federal Defendants,</i>)	
)	
and)	
)	Honorable Michelle Williams
SABLE OFFSHORE CORP.,)	Court
)	United States District Judge
<i>Intervenor-Defendant.</i>)	
)	
)	

I, Bobby Kurtz, state the following:

Currently, I am the Acting Regional Director for the Pacific Outer Continental Shelf Region, within the Bureau of Safety and Environmental Enforcement (“BSEE”) in the United States Department of the Interior (“DOI”). Between 2019 and April 18, 2025, I served as the

Regional Supervisor for the Office of Production and Development (“OPD”). Before that, I served as Chief of the Reservoir Development Section. I have been employed by BSEE for over 13 years.

As the Regional Supervisor for OPD, I am responsible for enforcing the regulations in 30 CFR 250, Subparts K-M, which govern oil and gas production requirements, oil and gas production measurement, surface commingling and security, and unitization. I am also in charge of enforcing the lease activity components of Subpart A. These lease activity components include primary lease requirements, lease term extensions, suspensions, and lease cancellations. In addition, OPD is responsible for providing technical support to aspects of other 30 CFR 250 Subparts, including the assessment of subsurface geohazards.

Amongst my duties, I am also in charge of overseeing the compilation of documents for this Supplemental Administrative Record in the above-captioned case. In this capacity, I requested and inspected agency records and files from the appropriate DOI components that pertain to plaintiffs’ claims concerning the challenged November 14, 2023 Lease Extension Decision, September 20, 2024 Applications to Modify (“APMs”) Decisions, and alleged failure to supplement the environmental analysis for the Santa Ynez Unit (“SYU”).

To the best of my knowledge and based on my personal observation and inquiries of other BSEE employees, I hereby certify that the documents listed in the Index were considered directly or indirectly during the challenged decisions and constitute the full and complete Supplemental Administrative Record for this litigation. I similarly certify that the attached documents that comprise the Supplemental Administrative Record constitute true, accurate, and complete copies of the original documents listed in the Index. I also certify that those documents in the Index dated September 25, 2024, and prior are in support of BSEE’s decision on the two

APMs; the documents in the Index dated November 14, 2023, and prior support BSEE's 2023 Lease Extension Decision; and the documents evidencing environmental reviews and analyses that are included throughout the Index relate to Plaintiffs' claim alleging failure to supplement the environmental analysis for the SYU.

I swear under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing information is true, accurate, and complete.

Respectfully submitted this 25th day of April 25, 2025.

**ROBERT
KURTZ**

Digitally signed by
ROBERT KURTZ
Date: 2025.04.25
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Bobby Kurtz